Operation and Maintenance
Support to Beneficial Use of Dredged Material at Sandusky Bay
Sandusky, Ohio

Scoping Information

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Buffalo District, U.S. Army Corps of Engineers
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1. Introduction

Implementation of the National Environmental Policy Act (NEPA) requires that federal agencies initiate “an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to the proposed action.” The purpose of this scoping information is to disseminate information regarding the U.S. Army Corps of Engineer’s (USACE) support to the City of Sandusky’s proposed beneficial use of dredged sediment project, and to elicit any concerns of potential affected parties. This information has been prepared as part of the formal scoping process pursuant to NEPA and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR Part 1500 et seq.).

The proposed federal project would provide dredged sediment from routine operations and maintenance (O&M) dredging to support a City of Sandusky effort to construct a beneficial use dredged sediment project involving the creation of wetland habitat within Sandusky Bay. This project is being coordinated closely not only with the USACE, but also with the Ohio Environmental Protection Agency and Ohio Department of Natural Resources.

The USACE support of the project would consist of providing sediment dredged from the Sandusky Harbor federal navigation channels as part of its routine harbor O&M activities for wetland creation purposes. The USACE evaluation of potential impacts will be specific to the placement of sediment at the locally constructed wetland habitat and will not address the previously evaluated O&M dredging activities at Sandusky Harbor or the construction of the wetland habitat itself.

Sandusky Bay and the proposed wetland area are located in northern Ohio within Erie County, along the southern shore of Lake Erie. It lies approximately 55 miles west of the Cleveland Harbor and 50 miles east of the Toledo Harbor along Cedar Point Drive (Figure 1). The bay is approximately 18 miles long and five miles wide and is protected from Lake Erie by the Marblehead peninsula on the northwest and the Cedar Point peninsula on the southeast.

2. Background

There is an increasing awareness of the need to protect and restore Great Lakes coastal wetlands. Natural and cultural practices have greatly altered the coastal wetlands of the Great Lakes and there is an increasing concern by federal agencies, state agencies and environmental groups that past and continued uses of the Great Lakes will lead to continued water quality problems, as well as significant losses in both globally rare habitats and biological diversity.

Many wetlands can improve water quality by filtering sediments and toxins as well as reducing flooding and erosion by acting as a sponge to absorb water during spring runoff and releasing it later in the year. Wetlands may also provide critical habitat for fish and wildlife. More than one-third of threatened and endangered species in the U.S. live only in wetlands, and nearly half of these species use wetlands at some point in their lives.
The City of Sandusky, with support from the State of Ohio, is proposing to design and construct 28 acres of emergent coastal wetland habitat within Sandusky Bay. This is being done in an effort to restore wetland habitat to the coastal Lake Erie region and also provide another mechanism for dredged sediment management at Sandusky Harbor. The objective of the project is to beneficially use sediment dredged from the federal navigation channels of Sandusky Harbor to create wetland habitat for the benefit of native flora and fauna. The USACE would provide federal support to the project by placing sediment it dredges from the Sandusky Harbor federal navigation channels at the wetland creation project location to achieve substrate elevations that would support a diverse aquatic vegetative community.

The federal navigation channels in Sandusky Harbor include the Moseley channel, the dock channel, the bay channel and the straight channel (Figure 2). These harbor channels are dredged on a nearly annual basis to accommodate efficient and safe deep-draft commercial navigation. The volume of sediment removed from Sandusky Harbor in the past has varied from 250,000 to 347,000 cubic yards each dredging cycle. This variation is due to availability of funding and other dredging priorities. In order to maintain project depths, at least 140,000 cubic yards of sediment typically needs to be removed every dredging season. The Sandusky Harbor federal navigation channels have varying authorized depths ranging from -21 to -26 feet below Low

Figure 1: Sandusky Bay location map

Figure 2: Sandusky Harbor federal navigation channels location map
The sediment traditionally dredged from the Sandusky Harbor federal navigation channels consists primarily of silts and clays, with some sands. The quality of sediments in the federal navigation channels have been evaluated in accordance with formal Clean Water Act Section 404(b)(1) Guidelines for testing and evaluation contained in the joint U.S. Environmental Protection Agency (USEPA)/USACE Great Lakes Dredged Material Testing and Evaluation Manual (1998) and Evaluation of Dredged Material Proposed for Discharge in Waters of the U.S.—Testing Manual (1998). The sediment proposed for use in wetland creation in Sandusky Bay has been determined to meet contaminant determination Clean Water Act Section 404(b)(1) Guidelines for open-water placement.

3. Need for Action

Several hundred million cubic yards of sediment must be dredged from United States ports, harbors, and waterways each year to maintain and improve the nation's navigation system for commercial, national defense, and recreational purposes. Traditional dredging methods discharge sediment into confined disposal facilities or in waters of oceans, rivers, lakes, wetlands, and estuaries. Dredged sediment containment facilities in the United States are nearly, or are already, filled to capacity with sediment. Identifying new containment sites poses
difficulties due to conflicting land uses, potential environmental impacts, and high values of near-water real estate. There are no confined disposal facilities available to Sandusky Harbor and all dredged sediment has historically been placed at an authorized open water placement site in Lake Erie.

Due to growing scientific knowledge and public awareness of using dredged sediment as a valuable resource, beneficial use of dredged sediment has at times become a viable alternative to traditional "dredge and dispose" methods for many projects. Environmental, economic, social, and other benefits can be derived from the productive use of dredged sediment. This increased awareness has coincided with the growing difficulty in locating new dredged sediment disposal areas and escalating disposal costs. The USACE has long had general policies offering broad support for the use of dredged sediment for beneficial purposes and has incorporated beneficial use projects into its Civil Works dredging program. With the placement of dredged sediment at the proposed City of Sandusky’s wetland creation project site, the USACE would continue to support such environmentally acceptable alternative uses of dredged sediment (provided all applicable permits and approvals are obtained by the city).

4. Proposed Action

The USACE would place approximately 260,000 cubic yards of dredged sediment within two containment cells to be constructed by the City of Sandusky. Approximately 182,000 cubic yards of dredged sediment would be placed within the west containment cell, while approximately 78,000 cubic yards would be placed within the east containment cell. The dredged sediment would be hydraulically or mechanically offloaded from scows into containment cells constructed by the city. Figure 3 is a plan view drawing of the preliminary design of the dredge sediment containment cells that will be constructed by the City of Sandusky as wetland habitat.

The exact method for unloading the dredged sediment into the placement cells will be determined by the contractor completing the work. If the sediment is to be mechanically offloaded, excavators would likely be used to remove the dredged sediment from scows and into chutes which would then distribute the sediment within the required deposition locations. If the sediment is to be hydraulically offloaded, then scow loads of dredged sediment would be brought to a hydraulic unloader positioned at the mooring structure fronting the cells. A hydraulic unloader utilizes water jets on the end of a pump inlet to slurry (20-30 percent solids) the sediment so that the pump can remove it from the scow and transport it through a piping system into the containment cells. The scow would be repositioned as necessary so that the pump inlet could reach the entire barge to remove all the dredge sediment. Water used to slurry the dredged sediment and transport it to the containment cells would be sourced from the Sandusky Bay.
5. Environmental Impacts

The environmental effects of Sandusky Bay O&M dredging have been previously evaluated and are documented in the *Final Environmental Impact Statement, Operation and Maintenance, Sandusky Harbor, Ohio (1975)*; *Environmental Assessment and Section 404(b)(1) Evaluation, Operation and Maintenance, Sandusky Harbor, Ohio (1985)*. These documents and supplemental documentation, have been submitted previously to USEPA and copies are available for examination at the USACE office in Buffalo, New York. The environmental effects of the placement of 260,000 cubic yards of dredged sediment into containment cells in the Sandusky Bay will be additionally evaluated in accordance with the Council on Environmental Quality’s “National Environmental Policy Act Implementing Regulations” (40 CFR 1500-1508) and Engineer Regulation 200-2-2 (Procedures for Implementing NEPA).
Future conditions and anticipated potential effects of the proposed action (i.e., placement of dredged sediment into the city’s facility) will be assessed and compared to a no action alternative. The no action alternative represents the anticipated condition that may result from the USACE taking no action to support the city’s proposed wetland creation project. The alternatives will be evaluated for several social, economic and environmental categories, including:

- Biological Resources
- Recreation
- Cultural Resources
- Socioeconomics
- Transportation
- Geology & Soils
- Water Resources
- Solid Waste Management
- Contaminated Materials
- Air Quality
- Noise
- Aesthetics
- Health and Safety
- Environmental Justice

6. Public Participation and Interagency Coordination

Throughout the scoping process, stakeholders and interested parties are invited to provide comment on the proposed action that will be evaluated as part of the O&M support to this beneficial use of dredged sediment in Sandusky Bay. An environmental assessment will be completed to document the evaluation of any potential social, economic and environmental benefits and potential adverse impacts that may result from the proposed action.

7. Compliance with Environmental Protection Statues

a. National Environmental Policy Act (NEPA). In accordance with the Council on Environmental Quality’s “National Environmental Policy Act Implementing Regulations” (40 CFR 1500-1508) and Engineer Regulation 200-2-2 (Procedures for Implementing NEPA), the USACE will assess the potential environmental effects of the proposed action on the quality of the human environment. Using a systematic and interdisciplinary approach, an assessment will be made of the potential environmental impacts for the proposed action as judged by comparing the with-project and without-project conditions. The impact assessment process will determine if an Environmental Impact Statement is required, or if an Environmental Assessment and Finding of No Significant Impact is appropriate. This scoping information constitutes an initial request for public and agency input into this NEPA review process.
b. **Clean Water Act.** Section 404 of the CWA requires a permit before dredged or fill material (including return water) may be discharged into waters of the United States. The City of Sandusky will be responsible for applying for and acquiring such a permit under Section 404 of the CWA as well as Section 10 of the Rivers and Harbors Act. The city will also be responsible for requesting certification from the Ohio Environmental Protection Agency that the proposed project (including receipt and management of USACE-dredged sediment) is in compliance with the applicable State of Ohio water quality standards.

c. **National Historic Preservation Act.** Under Section 106 of this Act, this scoping information initiates USACE consultation with the National Park Service, the Ohio Historic Preservation Office, interested Tribal nations, historic preservation organizations and others likely to have knowledge of, or concern with, historic properties that may be present within the area of potential effect. A Section 106 Review - Project Summary Form and Determination of Effects sent under separate cover will additionally initiate consultation with the Ohio State Historic Preservation Office.

d. **Coastal Zone Management Act.** The Act requires that federal actions reasonably likely to affect any land or water use or natural resource of the coastal zone, regardless of location, be consistent with approved state coastal management programs. The City of Sandusky will need to determine whether their project (including receipt and management of USACE-dredged sediment) is consistent with the applicable coastal zone policies of the State of Ohio and receive concurrence from the Ohio Department of Natural Resources.

e. **Endangered Species Act.** In accordance with Section 7 of this Act, USACE is requesting information from the U.S. Fish and Wildlife Service (USFWS) on any listed or proposed species or designated or proposed critical habitat that may be present in the project area. If this consultation with USFWS identifies any such species or critical habitat, then USACE will conduct a biological assessment to determine the proposed project’s effect on these species or critical habitat.

The USFWS web sites (https://www.fws.gov/midwest/endangered/lists/ohio-spp.html) and Information for Planning Consultation (https://ecos.fws.gov/ipac/) have been reviewed to generate the following list of federally threatened and endangered species that are/or may be present in Erie County, OH:

- Indiana bat (*Myotis sodalis*)
- Piping plover (*Charadrius melodus*)
- Red Knot (Rufa) (*Calidris canutus rufa*)
- Lakeside Daisy (*Hymenoxys herbacea*)

f. **Fish and Wildlife Coordination Act.** The USACE is coordinating this project with the USFWS and Ohio Department of Natural Resources - Division of Wildlife. The USACE will collaborate with these agencies to identify any fish and wildlife concerns, relevant information on the project area, obtain their views concerning the significance of fish and wildlife resources and anticipated project impacts, and identify those resources which need to be evaluated. Full
consideration will be given to their comments and recommendations resulting from this coordination.

g. Other Coordination Requirements. In addition to the aforementioned federal statutes, the proposed project must also comply with other applicable or relevant and appropriate federal laws. The list below Section 8 presents a comprehensive list of environmental protection statutes, executive orders, etc. Therefore, an additional intent of this fact sheet is to disseminate pertinent project information to meet the applicable coordination/consultation requirements required under their provisions.

8. Request for Comments

The purpose of the scoping process is to provide an opportunity for the public and government agencies to comment on and provide input to help identify issues related to the proposed project to be addressed in the environmental assessment. If, after this evaluation, it is concluded that the proposed project would have no significant environmental impacts and an environmental impact statement is not required, the District Commander will sign a finding of no significant impact (FONSI).

Interested parties are encouraged to contact USACE with their comments and recommendations regarding the proposed USACE support to beneficial use of dredged material at the Sandusky Bay. Please review the proposed project information and send your comments or recommendations in writing within 30 days to the following e-mail address:

SanduskyDredging@usace.army.mil

or via mail to:

U.S. Army Corps of Engineers, Buffalo District
Environmental Analysis Team
1776 Niagara Street
Buffalo, NY 14207-3199
ATTN: Environmental Analysis - Sandusky Beneficial Use

1. PUBLIC LAWS

(d) Archaeological and Historic Preservation Act, P.L. 93-291; 16 U.S.C. 469, et seq. (Also known as the Reservoir Salvage Act of 1960, as amended; P.L. 93-291, as amended; the Moss-Bennett Act; and the Preservation of Historic and Archaeological Data Act of 1974.)
(e) Bald Eagle Act; 16 U.S.C. 668.
(f) Clean Air Act, as amended; P.L. 91-604; 42 U.S.C. 1857h-7, et seq.
(g) Clean Water Act, P.L. 92-500; 33 U.S.C. 1251, et seq. (Also known as the Federal Water Pollution Control Act; and P.L. 92-500, as amended.)
(w) River and Harbor Act of 1899, 33 U.S.C. 403, et seq. (Also known as the Refuse Act of 1899.)

2. EXECUTIVE ORDERS

(e) Executive Order 12088, Federal Compliance with Pollution Control Standards, October 13, 1978.
(g) Executive Order 12856, Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements, August 3, 1993.

3. OTHER FEDERAL POLICIES

(b) Council on Environmental Quality Memorandum of August 10, 1980: Interagency Consultation to Avoid or Mitigate Adverse Effects on Rivers in the National Inventory.  
(c) Migratory Bird Treaties and other international agreements listed in the Endangered Species Act of 1973, as amended, Section 2(a)(4)